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7 UNITED STATES DISTRICT COURT  
8 WESTERN DISTRICT OF WASHINGTON

9 JASON MOLLETT,

10 Plaintiff,

Case No.: 3:20-CV-06168 RSM

11 v.

12 **STIPULATED MOTION FOR**  
13 **THE EXTENSION OF**  
14 **DEADLINES**

15 AEROTEK, INC., PINKERTON CONSULTING  
16 & INVESTIGATIONS, INC., ELLIS &  
17 ASSOCIATES INVESTIGATIONS LLC, PARK  
18 PLAZA LLC, EDWARD WAYNE RHOADS and  
19 ARLENE RHOADS, husband and wife, and their  
20 marital community, JOHN DOES 1-10, and ABC  
21 CORPORATIONS 1-10, unknown business  
22 entities,

23 Defendants.

24 **STIPULATION**

25 The parties to this action, by and through their undersigned counsel, request that  
26 the Court extend the initial disclosures deadlines set forth in the docket text on December  
17, 2020. The parties have engaged in a limited amount of discovery while the case was  
pending in State Court. Plaintiff filed a Motion for Remand (Dkt. #25) which was noted  
for the Court's consideration on January 22, 2021. An extension may allow the parties to

1 avoid any unnecessarily duplicative discovery under the Federal Rules if a decision to  
2 remand is granted. There has been one prior extension of the initial disclosure deadlines.

3 IT IS SO STIPULATED

4 RESPECTFULLY SUBMITTED this 12th day of February, 2021.

6 DALTON LAW OFFICE PLLC

CHOCK BARHOUM LLP

8 By: /s/ Nicole T. Dalton  
9 Nicole T. Dalton, WSBA No. 38320  
10 *Attorneys for Plaintiff Jason Mollett*

By: /s/ Erica Deatherage  
Erica Deatherage, WSBA No. 50520  
11 *Attorneys for Defendants Ellis and Rhoads*

12 BETTS PATTERSON & MINES PS

HITT HILLER MONFILS WILLIAMS LLP

13 By: /s/ S. Karen Bamberger  
14 S. Karen Bamberger, WSBA No. 18478  
15 *Attorneys for Defendant Pinkerton*

By: /s/ Scott T. Schauerma  
Scott T. Schauerma  
16 *Attorneys for Defendant Aerotek, Inc. &*  
17 *Park Plaza*

18 **IN ACCORDANCE WITH THE STIPULATION OF THE PARTIES**, the  
19 Court **ORDERS** that the deadlines set in the Court's unnumbered, December 17, 2020  
20 docket entry are hereby vacated and stricken pending a ruling on Plaintiff's motion for  
21 remand. If necessary, the Court will reset deadlines at the appropriate time.

22 DATED this 23<sup>rd</sup> day of February, 2021.

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24 RICARDO S. MARTINEZ  
25 UNITED STATES DISTRICT JUDGE  
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